



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

FEB 14 1992

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Douglas A. Niedt, President
Steelcote Manufacturing Company
One Steelcote Square
St. Louis, Missouri 63103

Re: "Plan of Study" submitted pursuant to Administrative
Order on Consent, Docket No. VII-91-0025

Dear Mr. Niedt:

We have reviewed the "Plan of Study" which was submitted according to the requirements of the Administrative Order on Consent signed September 30, 1991. The Environmental Protection Agency (EPA) has not approved the Proposal since we believe certain items need to be clarified and/or corrected before approval can be granted. These items are addressed in the enclosed comments. According to the Order, if the Proposal is disapproved, EPA will provide comments to Respondents regarding the deficiencies in the Proposal and Respondents will have fifteen (15) days to address the comments and resubmit the Proposal to EPA for approval. The following comments are arranged in the subject order encountered in the "Plan of Study."

Should you have any questions about the comments, please contact Cynthia Hutchison, of my staff, at (913) 551-7478.

Sincerely,

Michael J. Sanderson
Chief, RCRA Branch
Waste Management Division

Enclosure

cc: Alphonse McMahon, Esq. (w/o encl.)

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to be available
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COMMENTS ON THE PLAN OF STUDY

1.4 Hazardous Waste Concerns. The introduction infers that the only soil sampling contemplated is to take place during drilling and development of the monitoring wells. EPA is asking for soil borings and samplings to be done at areas of obvious soil staining and disposal, i.e. the courtyard where ruptured drums were observed and apparent disposal occurred.

2.3 Field Work/Subsequent Phases. EPA is asking for soil borings and samples to be done of the courtyard area and any other obvious soil staining and disposal areas concurrent with the installation of monitoring wells, prior to the additional work stage.

2.6 Data Analysis and Reports. Page 14 of the plan states that the draft report will be submitted to the client within three months after the initial quarterly monitoring has been completed (month 5-1/2). Three months is too long for compilation of the limited amount of data that will be available. Figure 7 shows the draft report submitted upon completion of additional subsurface investigation (month 9), and page 18 says the draft form will be completed immediately following the completion of any additional subsurface investigations performed. Which is the correct schedule?

The final report will be submitted within three months after the final quarterly monitoring. Reading Figure 7 it appears that it only takes 90 days to complete the final report and there is a 90 day period after the final quarterly monitoring where there is no activity scheduled. What is the reason for the lag time? The proposed schedule could be condensed.

p.19 Technical Procedures I, Soil Drilling. A soil drilling procedure is described including "After each boring has been advanced to the desired depth and samples collected, the hole will be grouted to the surface." However, other than the soil collected during drilling for the monitoring wells, which will not be grouted to the surface, no soil borings or samplings are mentioned in the "Plan of Study."

p.21 Technical Procedures 1, Soil Sampling. The text states "Soil samples for chemical analysis will be obtained at different locations around the site using a variety of sample tools." EPA is asking for sampling locations to be identified on a plan map in advance.

p.23 Technical Procedures 2, Monitoring Well Design and Installation. Technical Procedure 2 says that borings will be of sufficient diameter to permit at least two inches of annular space between the boring wall and all sides of the riser and screen. This is not possible when using 4-1/4 inch augers to install 2 inch diameter wells (page 11). A 6-1/2 inch auger

should be used to install a 2 inch well. The larger space between the inner diameter of the auger and the outer diameter of the well casing should permit effective placement of the filter pack, bentonite seal, and grout.

Granular bentonite or bentonite chips shall be used to construct the seal, with incremental layers placed in 6 inch thick lifts. 1 to 2 gallons of potable water shall be added after placement of each 6 inches of granular bentonite, until a 2 foot seal has been constructed. An additional 2 gallons of potable water shall be added and the bentonite seal shall be allowed to hydrate for a minimum of 8 hours prior to grout placement.

p.27 Technical Procedure 4, Collection of Ground Water and Leachate Samples from Monitor Wells. Technical Procedure 4 says that purge water removed from monitoring wells will be discharged on the ground near the well. Prior to analytical testing, all purge water must be containerized and treated as a hazardous waste. Fluids will be tested for hazardous waste by taking a representative grab sample from the holding container. If the purge water is shown to be non-hazardous, it may be disposed of on-site in a manner which will ensure the integrity of the monitoring wells.

p.28 Technical Procedure 5, Field Permeability Testing. Technical Procedure 5 contains a wealth of information on permeability testing but does not identify the procedure(s) to be used at the Steelcote facility.

p.29 of QA/QC Plan, Cross Contamination Preventive Measures. There needs to be further explanation of the Cross Contamination Preventative Measures, specifically the statement that no drill or equipment will be allowed to make borings if visual contamination is present on the equipment (section 7.2 of the QA/QC Plan). What is the alternative to drilling into contamination? Will the location be abandoned and the borings relocated? What if an alternate location encounters visual contamination? EPA needs to see some contingency plans for drilling in contaminated areas.

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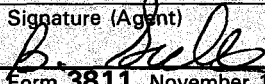
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